

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

POLAROID CORPORATION,

Plaintiff and Counterclaim-Defendant,

v.

HEWLETT-PACKARD COMPANY,

Defendant and Counterclaim-Plaintiff.

C.A. No. 06-738 (SLR)

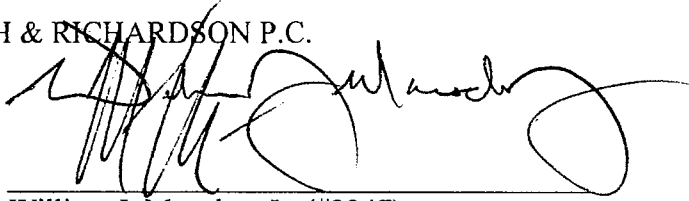
**NOTICE OF DEPOSITION OF POLAROID CORPORATION
PURSUANT TO FED. R. CIV. PROC. 30(b)(6)
REGARDING NOTICE UNDER 35 U.S.C. § 287**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Hewlett-Packard Company, by its counsel, will take the deposition of Polaroid Corporation at the offices of Fish & Richardson PC located at 225 Franklin Street, Boston, Massachusetts 02110 commencing at 9:00 a.m. on June 29, 2007, or at such other place and time as may be agreed upon by counsel. The deposition will continue from day to day until completed. Some or all of the deposition testimony may be recorded by stenographic, audio, audiovisual, video, and/or real-time computer means.

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Polaroid Corporation is obligated to designate one or more officers, directors, or managing agents or other persons who consent to testify on its behalf concerning the matters set forth in the attached Appendix. Polaroid Corporation is requested to set forth, for each person designated, the matters on which the person will testify.

Dated: June 7, 2007

FISH & RICHARDSON P.C.



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APPENDIX
DEFINITIONS

1. As used herein, "Polaroid" and "Plaintiff" and "Plaintiffs" and "you" or "your" mean Polaroid Corporation and all of its respective past and present predecessors (merged, acquired, or otherwise), successors, subsidiaries, parents, sisters, partnerships, and affiliates - including without limitation Petters Group Worldwide and J.P. Morgan Chase & Co. - and all directors, officers, agents, employees, attorneys and other persons acting on their behalf.

2. As used herein, "HP" means Hewlett-Packard Company and all its predecessors (merged, acquired, or otherwise), successors, subsidiaries, parents, sisters, partnerships and affiliates thereof, and all directors, officers, agents, employees, attorneys and other persons acting on its behalf.

3. As used herein, "Present litigation" refers to *Polaroid Corporation v. Hewlett-Packard Company*, No. 06-738 (D. Del.).

4. As used herein, the "381 patent" means U.S. Patent No. 4,829,831 and all the patent applications from which it issued, namely U.S. Patent Application No. 07/182,987, filed April 18, 1988.

5. As used herein, "Patent-in-suit" means the '381 patent, and any other Polaroid patents which are added as a basis for infringement to this action in any amended pleading or complaint.

6. As used herein, "Patent" means an issued United States Patent and all of the following that have been filed in support of any such United States Patent and/or that are related to any such United States Patent: United States Patent applications (without regard to whether

the application matured into an issued Patent), including parent and related applications; reissue applications; divisional applications; continuations; and continuations-in-part.

7. As used herein, “Communication” means any transmission of information by one or more persons and/or between (or among) two or more persons by any means including telephone conversations, letters, telegrams, teletypes, telexes, telecopies, electronic mail, other computer linkups, written memoranda, and face-to-face conversations.

8. As used herein, “and” and “or” shall be construed conjunctively and disjunctively so as to acquire the broadest meaning possible (and so as to make the request at issue most inclusive).

9. As used herein, “any” and “all” shall each be construed in the way that makes the request at issue most inclusive.

10. As used herein, “include” (or “including” or “includes”) shall be construed to mean “without limitation,” so as to acquire the broadest meaning possible.

11. The singular and masculine form of a noun or pronoun shall embrace, and shall be read and applied as, the plural or the feminine or neuter, as the particular context makes appropriate (and shall be read in the way that makes the request at issue most inclusive).

12. The singular form of a word should be interpreted in the plural as well. Any pronoun shall be construed to refer to the masculine, feminine, or neuter gender as in each case is most inclusive.

13. As used herein, “document” (or “Document” or “documents” or “Documents”) has the same broad meaning as in Rule 34 of the Federal Rules of Civil Procedure. The term “document” (or “Document” or “documents” or “Documents”) also encompasses tangible things.

14. As used herein, "All documents" (or "all documents") means any and all documents that might reasonably be located through a search of all locations reasonably likely to contain documents called for by these requests.

15. As used herein, "Person" (or "person") means any natural person or any business, legal, or governmental entity, or association.

16. As used herein, "relates to," "relating to" and "related to" mean describing, discussing, evidencing, concerning, reflecting, comprising, illustrating, containing, embodying, constituting, analyzing, stating, identifying, referring to, dealing with, demonstrating, or in any way pertaining to.

17. As used herein, "Third Party" means all Persons, individuals, corporations, partnerships and other entities of any kind that are not parties to this litigation, including customers and investors, as well as all Persons acting on behalf of such Third Parties, including their officers, agents, employees, and attorneys.

TOPICS OF DEPOSITION

1. All facts and circumstances concerning Polaroid's contention that it provided actual notice of the patent-in-suit to HP, pursuant to 35 U.S.C. § 287, prior to December 5, 2006.
2. Any written communication, including but not limited to letters, e-mails, and faxes, between Polaroid and HP that Polaroid contends constitutes actual notice of infringement pursuant to 35 U.S.C. § 287.
3. Any oral communication between Polaroid and HP that Polaroid contends constitutes actual notice of the Patent-In-Suit pursuant to 35 U.S.C. § 287, including the names of the participants, dates, and the specific content and/or subject matter of each oral communication.
4. The identification of any in-person meetings, including locations, dates, time, participants, and substance of the meetings, in which Polaroid contends it provided notice of the patent-in-suit pursuant to 35 U.S.C. § 287.
5. The identity, location and authenticity of documents, electronic files, databases, and other tangible things relating to or containing information relating to the categories set forth in the topics 1-4 above.
6. To the extent not already identified or covered, the identity and location of witnesses knowledgeable about information relating to the categories set forth in the topics 1-5 above.

CERTIFICATE OF SERVICE

I hereby certify that on June 7, 2007, I served a copy of the attached Notice of Deposition on the following individuals in the manner indicated:

Via E-mail and Federal Express

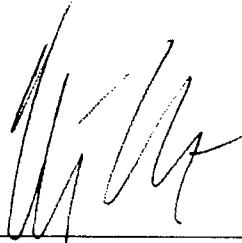
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